



# **Air Quality Permitting Response to Public Comments**

**April 14, 2017**

**Permit to Construct No. P-2011.0040  
Project 61683**

**The Amalgamated Sugar Company LLC  
Paul, Idaho**

**Facility ID No. 067-00001**

Prepared by:  
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AIR QUALITY DIVISION

**Final**

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## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for The Amalgamated Sugar Company LLC - Paul from March 13, 2017 through April 12, 2017, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section.

## PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at:

<http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

**Comment 1:** Pg. 6 Condition 3.3 Emissions Limits (Table 3.2) – For long-term emissions, TASCO recommends that Table 3.2 include a combined limit for all boilers. This would allow for additional operational flexibility of the individual natural gas-fired boilers. Condition 3.3 should also reference the Nebraska boiler since this boiler is permitted to operate as a backup to the B&W or Erie City boiler. TASCO proposes the following edits to Condition 3.3 and Table 3.2:

### 3.3 Emission Limits

*The combined emissions from the Boilers (B&W, Erie City, Nebraska) shall not exceed any corresponding emissions rate limits listed in Table 3.2.*

Table 3.2 Boiler Emission Limits<sup>(a)</sup>

Source Description	PM <sub>10</sub> <sup>(b)</sup> T/yr <sup>(c)</sup>	SO <sub>2</sub> T/yr <sup>(c)</sup>	NO <sub>x</sub> T/yr <sup>(c)</sup>	CO T/yr <sup>(c)</sup>	VOC T/yr <sup>(c)</sup>
Boilers	11.89	1.00	266.97	128.33	8.70

a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c Tons per campaign year, as defined in Condition 2.1.d. B&W, Erie City and Nebraska

In addition, TASCO does not concur with IDEQ's response to facility comments regarding the Nebraska backup boiler and the combined emissions limits. Since there will be no emissions increases above the proposed limits in Table 3.3, an ambient air quality impact analysis should not be required when the Nebraska boiler operates as a backup to the B&W or Erie City boilers. However, as requested by IDEQ modelers, TASCO recently completed an ambient impact analysis for the Nebraska backup boiler project. This project specific analysis demonstrates that predicted ambient impacts are insignificant and below significant impact levels (SIL's).

**Response 1:** The Nebraska boiler is permitted as a backup boiler and currently permitted under a separate permit (P-050406). The proposed permit and application submitted by TASC0 only evaluated boiler emissions from the B&W and Erie City boilers and not the Nebraska boiler. Therefore, the Nebraska boiler cannot be included in the proposed permit as emissions were not evaluated for the proposed beet slice increase project. The ambient impact analysis that was completed for the Nebraska boiler was recently done as a separate project for the modification of P-050406 and cannot be combined into the beet slice increase project.

The annual emission limits will remain for the B&W and Erie City boilers.

**Comment 2:** Pg. 7 Condition 3.6 – The draft PTC 33,033,521 total therms and Condition 3.3 emissions limits for the boilers are based on campaign year projections provided in the PTC application. Therefore, TASC0 requests deleting and replacing “consecutive 12-months” in this condition with “campaign year.”

**Response 2:** Permit Condition 3.6 is changed to define the therm limit based on campaign year as defined in Permit Condition 2.1.

**Comment 3:** Pg. 7 Condition 3.7 – Consistent with the previous comment for Condition 3.6, TASC0 requests the following revision to Condition 3.7:

***Condition 3.7 Boiler Operation Recordkeeping (B&W, Erie City, Nebraska)***

***The permittee shall monitor and record the combined amount of fuel used in the boilers (B&W, Erie City, Nebraska) in therms per month and summing the monthly totals for the campaign year to demonstrate compliance with Condition 3.6.***

In addition, incorporation of the Nebraska backup boiler into this condition is also consistent with PTC No P-2011.0040, Project ID 61314 previously issued by IDEQ, August 13, 2014 (see Condition 2.5).

**Response 3:** Permit Condition 3.7 is changed to reference campaign year instead of “consecutive 12-months”. As stated in an earlier response, the Nebraska boiler is permitted under a separate permit and will not be included in the current permit.

**Appendix**

**Public Comments Submitted for**

**Permit to Construct**

**P-2011.0040**

**Comments on Draft Permit to Construct # P-2011.0040  
The Amalgamated Sugar Company LLC  
Paul, Idaho Facility (No. 067-00001)**

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<i>Boilers</i>	<i>11.89</i>	<i>1.00</i>	<i>266.97</i>	<i>128.33</i>	<i>8.70</i>

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*b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.*

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